



**AVID Communications, LLC
(formerly, Ironhorse Services, LLC)
Certification of CPNI Compliance
For Calendar Year: 2012**

OPERATING PROCEDURES STATEMENT

Avid Communications' operating procedures ensure that it is in compliance with the FCC's CPNI Rules because disclosure of, or permitting access to, our customers' CPNI is not allowed without obtaining the requisite customer approval, except as required by law, or the exceptions set forth in 47 U.S.C. §222, and Subpart U of Title 47 of the Code of Federal Regulations; 47 C.F.R. §64.2001 through §64.2011.

Avid Communications provides private telecommunications services over dedicated lines to small & medium size customers pursuant to a Master Service Agreement (MSA) via a dedicated account representative. The MSA uniformly addresses protection of calling records and customer sensitive information. Although Avid does meet the CPNI exemption qualification, the company has taken proactive steps to collect account passwords and implement an authentication process with employees for use with all customer accounts.

The company has internal procedures in place to educate our employees about CPNI and the disclosure of CPNI. Employees with access to this information are aware of the FCC's rules and are prohibited from disclosing or permitting access to CPNI without the appropriate customer consent or as permitted by law and the FCC rules.

Avid Communications does not distribute CPNI to third parties for sales or marketing purposes. Nor does Avid Communications share, sell, lease or otherwise provide CPNI to any of its affiliates, suppliers, vendors or third parties for the purpose of marketing any service. Avid Communications does not use CPNI for marketing purposes and therefore does not have records to maintain regarding marketing campaigns that use its customers' CPNI.